

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SONRAI SYSTEMS, LLC,

Plaintiff,

v.

ANTHONY M. ROMANO, GEOTAB, INC.,
THE HEIL CO. d/b/a ENVIRONMENTAL
SOLUTIONS GROUP,

Defendants.

Civil Action No. 1:16-cv-3371

Honorable Thomas M. Durkin

**DEFENDANT HEIL'S UNOPPOSED
MOTION TO FILE DOCUMENTS UNDER SEAL**

Defendant The Heil Co. ("Heil"), by and through its counsel, requests leave under Local Rule 26.2 to file its summary judgment brief, statement of facts, and exhibits under seal. In support of this Motion, Heil states as follows:

1. During the summary judgment conference held on June 22, 2023, the parties discussed the need to file under seal certain summary judgment papers containing information that a party had designated as Confidential under the Protective Order, with a redacted version to be filed thereafter.

2. Heil understood the Court approved of this approach during the conference, and this is the approach filed by co-defendant Geotab without objection.

3. As part of its Motion for Summary Judgment, Heil will be filing numerous exhibits that Heil and other parties have marked as confidential under the Protective Order. Heil's brief in support of that motion and its statement of material facts cite to, and at times quote, those exhibits.

4. Heil conferred with Co-Defendants Anthony Romano and Geotab Inc., and with Plaintiff Sonrai Systems, LLC, all of whom have indicated they have no objection to Heil's motion for leave to file its papers under seal.

WHEREFORE, Heil respectfully requests leave to file its summary judgment brief, statement of material facts, and its associated exhibits under seal with redacted versions to be filed by September 8, 2023.

August 30, 2023

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Respectfully submitted,

The Heil Co.

By: /s/ James Thompson
One of its attorneys

CERTIFICATE OF SERVICE

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

/s/ James Thompson
One of Heil's attorneys